

EXHIBIT A

Jennifer R. Pierce

From: nima.mohebbi@lw.com
Sent: Monday, November 21, 2022 9:47 PM
To: Andrew J. Urgenson, Esq.
Cc: JAMIE.WINE@lw.com; Terrence A. Oved, Esq.; James Reilly, Esq.; Darren Oved; matthew@gartnerlawfirm.com; Jennifer R. Pierce
Subject: EXTERNAL: RE: EXTERNAL: RE: EXTERNAL: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

EXTERNAL SENDER

Hi Andrew,

You are correct regarding Danny Rensch.

On the email from earlier, here is what I would say:

This email shall confirm our discussion on Friday where you advised us that to the best of your knowledge, Chess.com does not have any Connecticut citizens as members but that, given its complex organizational structure, you are unable to identify the citizenship of each of its members at this time.

Happy to discuss.

Best,
nhm

Nima H. Mohebbi

LATHAM & WATKINS LLP

355 South Grand Avenue, Suite 100 | Los Angeles, CA 90071-1560
D: +1.213.891.7482 | M: +1.304.633.3271

From: Andrew J. Urgenson, Esq. <andrew@oved.com>
Sent: Monday, November 21, 2022 4:18 PM
To: Mohebbi, Nima (LA) <nima.mohebbi@lw.com>
Cc: Wine, Jamie (NY) <JAMIE.WINE@lw.com>; Terrence A. Oved, Esq. <terry@oved.com>; James Reilly, Esq. <JReilly@oved.com>; Darren Oved <darren@oved.com>; matthew@gartnerlawfirm.com; Jennifer R. Pierce <jpierce@oved.com>
Subject: Re: EXTERNAL: RE: EXTERNAL: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

Counsel,

We understand that Danny Rensch is a Utah citizen. Do you mind confirming that?

Andrew J. Urgenson, Esq. | OVED & OVED LLP

[401 Greenwich Street | New York NY 10013](#)

T: [212.226.2376](tel:212.226.2376) x 227 | F: [212.226.7555](tel:212.226.7555)

andrew@ovedlaw.com | www.ovedlaw.com

The information contained in this email, and any attachments, may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. The transmission or receipt of this e-mail, and any attachments, in and of itself, does not, and is not intended to, create an attorney-client relationship with Oved & Oved LLP (the "Firm") or any of its attorneys. If you are not an existing client of the Firm, then the sending of an e-mail to the Firm or any of its attorneys does not create an attorney-client relationship with you and the information contained in this e-mail, and any attachments, are not legal advice and you should not use or rely on them as such.

On Nov 21, 2022, at 1:53 PM, Andrew J. Urgenson, Esq. <andrew@oved.com> wrote:

Counsel,

It was nice to make your acquaintance last week. This email shall confirm our discussion on Friday where you advised us that Chess.com does not have any Connecticut citizens as members but that, given its complex organizational structure, you are unable to identify the citizenship of each of its members at this time.

Kindly advise if you have any additional updates before we include this information in an amended complaint. Given the upcoming holiday, we will likely file it early tomorrow.

Best,

Andrew J. Urgenson, Esq. | OVED & OVED LLP
401 Greenwich Street | New York NY 10013
T: 212.226.2700 x 227 | F: 212.226.7555
andrew@oved.com | www.oved.com

The information contained in this email, and any attachments, may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. The transmission or receipt of this e-mail, and any attachments, in and of itself, does not, and is not intended to, create an attorney-client relationship with Oved & Oved LLP (the "Firm") or any of its attorneys. If you are not an existing client of the Firm, then the sending of an e-mail to the Firm or any of its attorneys does not create an attorney-client relationship with you and the information contained in this e-mail, and any attachments, are not legal advice and you should not use or rely on them as such.

From: nima.mohebbi@lw.com <nima.mohebbi@lw.com>

Sent: Thursday, November 17, 2022 4:51 PM

To: Andrew J. Urgenson, Esq. <andrew@oved.com>

Cc: JAMIE.WINE@lw.com; Terrence A. Oved, Esq. <terry@oved.com>; James Reilly, Esq. <JReilly@oved.com>; Darren Oved <darren@oved.com>; matthew@gartnerlawfirm.com

Subject: EXTERNAL: RE: EXTERNAL: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

EXTERNAL SENDER

Can we shoot for tomorrow at 9 am pt?

From: Andrew J. Urgenson, Esq. <andrew@oved.com>
Date: Thursday, Nov 17, 2022, 1:46 PM
To: Mohebbi, Nima (LA) <nima.mohebbi@lw.com>
Cc: Wine, Jamie (NY) <JAMIE.WINE@lw.com>, Terrence A. Oved, Esq. <terry@oved.com>, James Reilly, Esq. <JReilly@oved.com>, Darren Oved <darren@oved.com>, matthew@gartnerlawfirm.com
<matthew@gartnerlawfirm.com>
Subject: RE: EXTERNAL: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

Counsel,

Is there a time that works better for you?

Andrew J. Urgenson, Esq. | OVED & OVED LLP
401 Greenwich Street | New York NY 10013
T: 212.226.2700 x 227 | F: 212.226.7555
andrew@oved.com | www.oved.com

The information contained in this email, and any attachments, may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. The transmission or receipt of this e-mail, and any attachments, in and of itself, does not, and is not intended to, create an attorney-client relationship with Oved & Oved LLP (the "Firm") or any of its attorneys. If you are not an existing client of the Firm, then the sending of an e-mail to the Firm or any of its attorneys does not create an attorney-client relationship with you and the information contained in this e-mail, and any attachments, are not legal advice and you should not use or rely on them as such.

From: Andrew J. Urgenson, Esq.
Sent: Thursday, November 17, 2022 2:16 PM
To: nima.mohebbi@lw.com
Cc: JAMIE.WINE@lw.com; Terrence A. Oved, Esq. <terry@oved.com>; James Reilly, Esq. <JReilly@oved.com>; Darren Oved <darren@oved.com>; matthew@gartnerlawfirm.com
Subject: RE: EXTERNAL: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

How is today at 4pm?

Andrew J. Urgenson, Esq. | OVED & OVED LLP
401 Greenwich Street | New York NY 10013
T: 212.226.2700 x 227 | F: 212.226.7555
andrew@oved.com | www.oved.com

The information contained in this email, and any attachments, may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. The transmission or receipt of this e-mail, and any attachments, in and of itself, does not, and is not intended to, create an attorney-client relationship with Oved & Oved LLP (the "Firm") or any of its attorneys. If you are not an existing client of the Firm, then the sending of an e-mail to the Firm or any of its attorneys does not create an attorney-client relationship with you and the information contained in this e-mail, and any attachments, are not legal advice and you should not use or rely on them as such.

From: nima.mohebbi@lw.com <nima.mohebbi@lw.com>
Sent: Thursday, November 17, 2022 2:15 PM
To: Andrew J. Urgenson, Esq. <andrew@oved.com>
Cc: JAMIE.WINE@lw.com; Terrence A. Oved, Esq. <terry@oved.com>; James Reilly, Esq.

<JReilly@oved.com>; Darren Oved <darren@oved.com>; matthew@gartnerlawfirm.com

Subject: EXTERNAL: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

EXTERNAL SENDER

Counsel,

We are happy to have a call to discuss this. Please let me know your availability.

nhm

Nima H. Mohebbi

LATHAM & WATKINS LLP

355 South Grand Avenue, Suite 100 | Los Angeles, CA 90071-1560

D: +1.213.891.7482 | M: +1.304.633.3271

From: Andrew J. Urgenson, Esq. <andrew@oved.com>

Sent: Wednesday, November 16, 2022 6:53 AM

To: Mohebbi, Nima (LA) <nima.mohebbi@lw.com>

Cc: Wine, Jamie (NY) <JAMIE.WINE@lw.com>; Terrence A. Oved, Esq. <terry@oved.com>; James Reilly, Esq. <JReilly@oved.com>; Darren Oved <darren@oved.com>; matthew@gartnerlawfirm.com

Subject: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

Counsel,

In light of the Court's order this morning, we are following up on our request below that you identify the citizenship of Chess.com's members.

Please provide this information as soon as possible so we may promptly comply with the Court's order. If Chess.com is unwilling to disclose this information, please let us know so we can include its position in the amended complaint.

Thank you,

Andrew J. Urgenson, Esq. | **OVED & OVED LLP**
401 Greenwich Street | New York NY 10013
T: 212.226.2700 x 227 | F: 212.226.7555
andrew@oved.com | www.oved.com

The information contained in this email, and any attachments, may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. The transmission or receipt of this e-mail, and any attachments, in and of itself, does not, and is not intended to, create an attorney-client relationship with Oved & Oved LLP (the "Firm") or any of its attorneys. If you are not an existing client of the Firm, then the sending of an e-mail to the Firm or any of its attorneys does not create an attorney-client relationship with you and the information contained in this e-mail, and any attachments, are not legal advice and you should not use or rely on them as such.

From: Andrew J. Urgenson, Esq.

Sent: Monday, October 24, 2022 1:10 PM

To: nima.mohebbi@lw.com; Terrence A. Oved, Esq. <terry@oved.com>; Darren Oved <darren@oved.com>; James Reilly, Esq. <JReilly@oved.com>; matthew@gartnerlawfirm.com

Cc: JAMIE.WINE@lw.com

Subject: RE: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

Counsel,

Our client is aware of his legal obligations; naturally we expect the same of your client Chess.com.

Please advise what other defendants, if any, you represent, and whether you will accept service of the Summons and Complaint on behalf of your clients.

In addition, kindly confirm that none of Chess.com's members are Connecticut citizens.

Cordially,

Andrew J. Urgenson, Esq. | **OVED & OVED LLP**
401 Greenwich Street | New York NY 10013
T: 212.226.2700 x 227 | F: 212.226.7555
andrew@oved.com | www.oved.com

The information contained in this email, and any attachments, may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. The transmission or receipt of this e-mail, and any attachments, in and of itself, does not, and is not intended to, create an attorney-client relationship with Oved & Oved LLP (the "Firm") or any of its attorneys. If you are not an existing client of the Firm, then the sending of an e-mail to the Firm or any of its attorneys does not create an attorney-client relationship with you and the information contained in this e-mail, and any attachments, are not legal advice and you should not use or rely on them as such.

From: nima.mohebbi@lw.com <nima.mohebbi@lw.com>
Sent: Friday, October 21, 2022 4:49 PM
To: Terrence A. Oved, Esq. <terry@oved.com>; Darren Oved <darren@oved.com>; Andrew J. Urgenson, Esq. <andrew@oved.com>; James Reilly, Esq. <JReilly@oved.com>; matthew@gartnerlawfirm.com
Cc: JAMIE.WINE@lw.com
Subject: EXTERNAL: Neimann v. Carlsen (No. 4:22-cv-01110)

EXTERNAL SENDER

Counsel,

See attached. Rights reserved.

nhm

Nima H. Mohebbi

LATHAM & WATKINS LLP
355 South Grand Avenue, Suite 100
Los Angeles, CA 90071-1560
Direct Dial: +1.213.891.7482
Fax: +1.213.891.8763
Email: nima.mohebbi@lw.com
<http://www.lw.com>

This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, disclosure, reliance or distribution by others or forwarding

without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies including any attachments.

Latham & Watkins LLP or any of its affiliates may monitor electronic communications sent or received by our networks in order to protect our business and verify compliance with our policies and relevant legal requirements. Any personal information contained or referred to within this electronic communication will be processed in accordance with the firm's privacy notices and Global Privacy Standards available at www.lw.com.